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Knowledge, Focus, Expertise

**WANG, GAO &
ASSOCIATES P.C.**

October 8, 2013

VIA ECF

Hon. Mark Falk
United States Magistrate Judge
United States District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

**Re: Nike, Inc., v. Eastern Ports Customs Brokers, Inc.
Case No.: 2:11-cv-04390
Request for 1-day Extension to File City Ocean's Opposition to
Nike's Motion for Spoliation Sanctions**

Dear Hon. Falk:

This firm represents City Ocean Logistics Co. Ltd., and City Ocean International, Inc. (collectively, "City Ocean") in the above referenced matter. I write to respectfully request an 1-day extension for City Ocean to file an opposition to Nike's Motion for Spoliation Sanctions.

We are a small law firm with only a few attorneys. The attorney that was to handle this motion recently had a family death, and has not been able to work on this case. Unfortunately another attorney involved in this case was sick and was not able to put in much effort until October 7, 2013, yesterday. Although we have worked against time to complete the opposition to the motion, it was filed one day late.

For the foregoing reasons, I respectfully ask the Court to grant the 1-day extension requested, and deem City Ocean's filing of the opposition timely. I trust that there is no prejudice to Nike. However, to eliminate any adverse impact on Nike, if any, we will also consent to a short extension if Nike so requests

Respectfully,

/s/ Christian R. Oehm

Christian R. Oehm

WANG, GAO & ASSOCIATES, P.C.

Attorneys for Third Defendants

City Ocean Logistics Co. Ltd., and

City Ocean International, Inc.

cc: All counsel of record via email